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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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JUL 02 2015

RESOURCE PLANNING AND
PROCUREMENT IN 2013 AND 2014

DOCKETED BY MLB
Docket No. ~~E-00000V-13-0070~~

RESOURCE PLANNING AND
PROCUREMENT IN 2015 AND 2016

Docket No. ~~E-00000V-15-0094~~

COMMENTS OF THE JOINT SOLAR PARTIES

The Solar Energy Industries Association (SEIA)¹ and the Arizona Solar Energy Industries Association (AriSEIA)² ("Joint Solar Parties") submit these comments in response to Commissioner Little's letter dated June 16, 2015 (Docket No. E-00000V-13-0070) and Commissioner Burns' letter dated June 19, 2015 (Docket No. E-00000V-15-0094). We appreciate the attention the Commissioners are giving to this important issue and are grateful for the opportunity to respond.

The Joint Solar Parties agree that the Clean Power Plan should be fully considered in the 2016 Integrated Resource Plans (IRPs).

¹ SEIA is the national solar energy trade association. The comments contained in this filing represent the position of SEIA as an organization, but not necessarily the views of any particular member with respect to any issue.

² AriSEIA is a nonprofit trade association, representing local and national companies whose mission is to promote policies that promote greater use of solar energy in Arizona.

1 Regardless of what happens with the Clean Power Plan (CPP), the Joint Solar Parties believe that
2 renewable energy, and solar in particular, can and should play an increasingly important role in
3 Arizona utilities' 2016 IRPs. We are also keenly aware that the CPP could significantly influence
4 the magnitude and timing of renewable energy resources included in those plans. As such, we
5 strongly support the notion of allowing sufficient time for the CPP's impacts to be fully
6 considered. Depending on the date the final EPA Rule is issued, we believe there may already
7 be sufficient time in the process to do this. However, we also agree that some amount of delay
8 may be sensible, and could allow the opportunity for more robust analysis of the options
9 available.

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11 **Any extension of the IRP filing date should not detract from improvements to the IRP**
12 **process included in Decision No. 75068**

13 In Decision No. 75068, the Commission required certain changes to the 2016 IRP process and
14 clarified its ability to take additional steps to improve the process. Some of these included:

- 15 • Pre-filing workshops led by the Commission
- 16 • Commission approval (rather than "acknowledgement") of the 3-year action plans
- 17 • Discussion in each IRP of plans for aging generation plants
- 18 • Consideration in each IRP of an expanded renewables portfolio

19 If the Commission decides to delay the 2016 IRP cycle, it should ensure that this delay does not
20 jeopardize any of those recent improvements to the IRP process that were adopted in Decision
21 No. 75068. For example, even with a delay, we would encourage the Commission to move
22 forward with its pre-filing workshop process.

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24 **Additional time afforded by a delay should also be used to continue to improve the IRP**
25 **process**

26 Commissioner Burns articulated in his concurring opinion to Decision No. 75068 that a
27 rulemaking may be necessary and worthwhile to solidify the improved IRP process. The Joint
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1 Solar Parties support this. We note that the extra time afforded by a delay in the IRP cycle could
2 also be used to ensure that this rulemaking is accomplished before the next plans are
3 acknowledged or approved by the Commission. Thus, we suggest that any decision to delay the
4 next IRP could be coupled with a decision to set this rulemaking process in motion.
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1 Respectfully submitted this 3rd day of July 2015,

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